

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 00-6309-CR-SEITZ

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CLERK'S OFFICE
U.S. DISTRICT COURT
S.D. OF FLA - MIAMI
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UNITED STATES OF AMERICA,

Plaintiff,

v.

ANSON KLINGER, et al.,

Defendant.

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT KLINGER

COMES NOW defense counsel Neil M. Nameroff, Esq., pursuant to Rule 4-1.16 of the Rules of Professional Conduct and hereby moves to withdraw as counsel for the defendant, and in support thereof would show as follows:

1. Since October 31, 2001, the undersigned counsel has been attorney of record for the defendant, Anson Klinger.
2. There has been a total breakdown in communication between client and attorney in this case whereby Mr. Klinger has not complied with the undersigned's repeated requests to visit his office to discuss disposition of this case. Further, Mr. Klinger has ignored or disregarded advice offered by the undersigned counsel. Additionally, Mr. Klinger has failed to fulfill his obligations to the undersigned counsel, despite reasonable warnings that the undersigned would withdraw unless agreed obligations were not by him.

NEIL M. NAMEROFF, ATTORNEY AT LAW

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3. It is anticipated that a superceding indictment will be filed in this case within the next two weeks. The withdraw of the undersigned as counsel for Mr. Klinger at this time would not prejudice the defendant or the prosecution.

4. On July 23, 2001, the undersigned counsel spoke to AUSA Brian McCormick to discuss the relief sought by this motion. Mr. McCormick stated that he would not object to the withdraw of the undersigned provided that defendant is ordered to obtain new counsel within ten (10) days of the order granting the withdraw of current counsel.

WHEREFORE the defense counsel respectfully prays that this Honorable grant his motion to withdraw as counsel for the above cited reasons.

I HEREBY CERTIFY that a true and correct copy of the foregoing was forwarded to the AUSA Brian McCormick, U.S. Attorney's Office, 299 East Broward Boulevard, Ft. Lauderdale, Florida 33301 and to Defendant, Anson Klinger, 5334 Sapphire Valley, Boca Raton, Florida 33486 this 24 day of July, 2001.

Respectfully submitted,

NEIL M. NAMEROFF, P.A.
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By:


NEIL M. NAMEROFF, ESQ.
Fla. Bar No: 230723